

# Schnader

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April 5, 2022

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***VIA ECF***

Magistrate Judge Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**RE: Donna Insinga v. Frontier Airlines**  
**Docket No.: 1:21-4359 (LDH) (SJB)**  
**Schnader File No. 3007949-0171**

Dear Magistrate Judge Bulsara:

We represent defendant Frontier Airlines with respect to the above matter, and submit this letter jointly with Plaintiff Donna Insinga to request an adjournment of the status conference scheduled for today, April 5, 2022, at 10:00 a.m. We understand that per Your Honor's rules, adjournments are to be requested at least 48 hours in advance, but counsel for both Plaintiff and Frontier failed to properly calendar the conference, and neither presently is located in New York.

As a brief update on status, the parties are proceeding with discovery with pre-deposition written discovery complete, and are in the process of scheduling party depositions for later this month and early May. Upon completion of these depositions, the parties will be in a better position to determine what further discovery is required, if any. In light of this, we respectfully request that the Court adjourn the status conference until May 16, 2022, or as soon thereafter as is convenient for the Court.

The parties are available at the Court's convenience to discuss this request, and apologize for our joint oversight, as well as the late request for an adjournment.

Respectfully submitted,



Barry Alexander

For SCHAFFER HARRISON SEGAL & LEWIS LLP

Cc: Erin Applebaum (**By ECF**)  
Counsel for Plaintiff